

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

ANTHONY JOHN BONOMO AND
VIRGINIA BONOMO,
Debtors

ANTHONY JOHN BONOMO AND
VIRGINIA BONOMO,
Movants

v.

BRANCH BANKING AND TRUST
COMPANY,
Respondent

CHAPTER 13

CASE NO. 5:16-bk-01894-RNO

MOTION TO AVOID LIEN

DEBTORS' MOTION TO AVOID LIEN

1. This motion is filed pursuant to 11 U.S.C. § 522(f) to avoid and cancel a judicial lien on real property owned by the Debtors.

2. On or about November 29, 2011, Susquehanna Bank obtained a judicial lien (the “Lien”) on real property owned by the Debtors and located at 101 Rear Marchakitus Road, Hunlock Creek, Luzerne County, Pennsylvania (the “Property”). The Lien was entered in Luzerne County at docket number 2011-CV-12741 in the amount of \$30,170.20.

3. Debtors’ interest in the property referred to in the preceding paragraph and encumbered by the lien has been claimed as exempt in the amount of “100% of fair market value, up to any applicable statutory limit.”

4. Branch Banking and Trust Company (“BB&T”) is the successor-in-interest to Susquehanna Bank and filed Proof of Claim 8 in the underlying bankruptcy case alleging that it owns the debt upon which the lien is based. **The claim indicates that the debt is unsecured.**

5. The existence of BB&T's lien on the Property impairs exemptions to which the Debtors would be entitled to under 11 U.S.C. § 522(b).

6. The Lien does not secure a debt for a domestic support obligation.

7. Service upon BB&T will be effectuated at the notices address listed on Proof of Claim 8.

That address is:

Branch Banking & Trust Company
Bankruptcy Section/100-50-01-51
P.O. Box 1847, 100-50-01-51
Wilson, NC 27894

WHEREFORE, Debtors request an Order canceling the Lien.

Date: February 15, 2017

s/ Leonard Gryskewicz, Jr.

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